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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

James M. Herndon,

Plaintiff,

vs.

City of Henderson, a political subdivision of The State of Nevada; **Sgt. M. Gillis,** individually and in his official capacity as a police officer; **Officer L. Good,** individually and in his official capacity as a police officer; **Officer A. Nelson,** individually and in his official capacity as a police officer; **Officer D. Nerbonne,** individually and in his official capacity as a police officer; **Officer D. Russo,** individually and in his official capacity as a police officer; **Officer E. Vega,** individually and in his official capacity as a police officer; Doe Officers I through X, inclusive and Roe Entities I through X, inclusive

Defendants.

CASE NO.: 2:19-cv-00018-GMN-NJK

Stipulation and Order to Extend Briefing Deadlines (ECF # 54)



1 Plaintiff, James Herndon, through his counsel of record, Marjorie L. Hauf, Esq. and
2 Matthew G. Pfau, Esq., of H & P LAW, and Defendants, City of Henderson, Sgt. M.
3 Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and
4 Officer E. Vega through their counsel of record, Nicholas G. Vaskov, Esq. and Nancy
5 D. Savage, Esq. of CITY ATTORNEY'S OFFICE, do hereby stipulate and agree to
6 Extend the due dates of Plaintiff's Opposition to Defendant, City of Henderson's
7 Motion for Summary Judgment and Defendant's Reply in Support to Defendant, City
8 of Henderson's Motion for Summary Judgment.

9 Currently, Plaintiffs' Opposition is due November 16, 2020. Plaintiff and
10 Defendant agree to Extend the Deadline for Plaintiff to file his Opposition to
11 December 2, 2020 and for Defendant to file their Reply in Support to
12 December 21, 2020. The extensions are being requested in good faith and not for
13 the purpose of delay. The extensions are being requested as the issues to be briefed
14 are extensive and complicated. The parties anticipate that additional time, from that
15 provided in the applicable court rules, will be needed to adequately address the
16 issues and complete their respective briefings for submission to the court.

17 18 **Stipulation**

19 It is hereby STIPULATED between James Herndon, through his counsel of record,
20 Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq., of H & P LAW, and Defendants,
21 City of Henderson, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D.
22 Nerbonne, Officer D. Russo, and Officer E. Vega through their counsel of record,
23 Nicholas G. Vaskov, Esq. and Nancy D. Savage, Esq. of CITY ATTORNEY'S OFFICE,
24 to Extend Briefing Deadlines Related to Defendant, City of Henderson's Motion for
25 Summary Judgment, ECF # 54.

26 IT IS FURTHER STIPULATED that Plaintiff's Opposition to Defendant, City of
27 Henderson's Motion for Summary Judgment must be filed by December 2, 2020.

28 IT IS FURTHER STIPULATED that Defendant, City of Henderson's Reply in

1 Support of Motion for Summary Judgment must be filed by December 21, 2020.

2 WHEREFORE, the parties respectfully request that the Court enter its order
3 extending deadlines as described in the stipulation above.

4 DATED this 10th day of November 2020.

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6 Respectfully submitted by:

7 H & P LAW

8 /s/ Marjorie L. Hauf, Esq.

9 Marjorie L. Hauf, Esq.

10 Nevada Bar No.: 8111

11 Matthew G. Pfau, Esq.

12 Nevada Bar No.: 11439

13
14 Attorneys for Plaintiff,
15 James M. Herndon

Approved as to form and content:

CITY ATTORNEY'S OFFICE

/s/ Nancy D. Savage, Esq.

Nicholas G. Vaskov, Esq.

Nevada Bar No.: 8298

Nancy D. Savage, Esq.

Nevada Bar No.: 392

Attorneys for Defendants,
City of Henderson, Sgt. S. Gillis, and
Officers L. Good, A. Nelson, D.
Nerbonne, D. Russo, and E. Vega

16 **IT IS SO ORDERED.**

17 Dated this 18 day of November, 2020

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21 Gloria M. Navarro, District Judge
22 UNITED STATES DISTRICT COURT
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